

EXHIBIT A



Planet Depos®
We Make It *Happen™*

Transcript of George Joseph Madera, M.D.

Date: December 7, 2023

Case: Madera, M.D. -v- Taos Health Systems, Inc., et al.

Planet Depos

Phone: 888.433.3767

Email: transcripts@planetdepos.com

www.planetdepos.com

1 and he also became head of the American College of 16:26:14
2 Cardiology. Okay? That's what I was being groomed 16:26:18
3 for. 16:26:21

4 This that you see here is a travesty of how 16:26:22
5 things should be done, ethically and through 16:26:25
6 committees. It's wrong. 16:26:28

7 Q. Okay. 16:26:30

8 A. And I told that to Dr. Moore. 16:26:30

9 Q. Okay. Do you have any evidence that 16:26:32
10 demonstrates that Holy Cross leadership made the 16:26:36
11 statements in the National Practitioner Data Bank 16:26:38
12 report for any other reason that they -- than they 16:26:42
13 thought that they were true? 16:26:45

14 MR. AKENHEAD: Form. Foundation. 16:26:46

15 THE WITNESS: I'm not sure I understand that 16:26:47
16 question. I think that one way to answer it is that 16:26:49
17 the record speaks for itself. When they withdrew it, 16:26:53
18 they knew it was wrong, period. 16:26:57

19 Q. BY MR. JENSEN: Okay. You'd agree with me, Dr. 16:26:59
20 Madera, that your Complaint in this case alleges that 16:27:05
21 your damages that you claim you have incurred arise out 16:27:08
22 of the filing of the MPDB report at issue, correct? 16:27:14

23 A. Yes. 16:27:17

24 Q. In other words, you allege that had Holy Cross 16:27:17
25 never filed the MPDB report, you wouldn't have suffered 16:27:22

1	any of these damages, correct?	16:27:25
2	A. I would qualify that a little bit. If Holy	16:27:27
3	Cross had not filed the illegal, unjust, untempered,	16:27:31
4	unthoughtful MPDB report, no, this wouldn't have	16:27:39
5	happened.	16:27:43
6	Q. You'd agree with me, Dr. Madera, that,	16:27:44
7	generally speaking, the purpose of the MPDB report is	16:27:46
8	one of public concern?	16:27:49
9	A. Public concern.	16:27:52
10	Q. Or the public interest.	16:27:54
11	MR. AKENHEAD: Foundation.	16:27:56
12	THE WITNESS: That's possibly true. I'm not	16:27:57
13	sure --	16:28:00
14	Q. BY MR. JENSEN: Okay.	16:28:00
15	A. -- what it's for because now it's being used as	16:28:01
16	a vehicle to get rid of people that you don't want.	16:28:03
17	Okay? And there's well documentation for sham peer	16:28:07
18	review. Patients are ostracized after they're peer	16:28:12
19	reviewed in a false manner, like I was. They're thrown	16:28:17
20	into the MPDB, and they're done for, cooked. This MPDB	16:28:20
21	may have had a -- may have had a very thoughtful,	16:28:25
22	insightful way of helping entities, like committees,	16:28:33
23	like credentialing committees, like hospital staffs, to	16:28:40
24	understand doctor movement from one state to another	16:28:44
25	if they had things reported that were fair, true, and	16:28:48